



June 30th, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

In Re: ET Docket No. 04-186
Ex Parte presentation

Dear Ms. Dortch:

On Tuesday, June 28th, John, Butler, Greg Buchwald and Chuck Powers, all from Motorola Solutions, Inc, and Stephen Coran, representing the Wireless Internet Service Providers Association (WISPA), met with Alan Stillwell, Karen Ansari, Hugh Van Tuyl, Geraldine Matise, Mark Newman, Steve Jones, Tom Phillips and Bill Hurst of the Office of Engineering and Technology.

The meeting was to discuss the Petitions for Reconsideration filed by Motorola Solutions and WISPA in response to the 2nd Memorandum Opinion and Order (2nd MO&O), released by the Commission on Sept. 23rd, 2010 in the above referenced docket.

The Petition from WISPA proposed revisions to the HAAT and AGL limitations on antenna locations and heights for fixed TV band devices (TVBDs), while the Petition from Motorola Solutions proposed a relaxation of the transmit spectral mask for fixed TVBDs. Both proposals should be adopted to ensure the commercial viability of the use of TV White Spaces for providing wireless broadband services. Key points discussed included:

- Without modifications to the HAAT and AGL limitations on antenna placement and heights for TVBDs, significant portions of the United States, particularly rural areas, would not be able to benefit from access to commercial fixed wireless broadband services that leverage the TV White Spaces spectrum.
- To compensate of the increased antenna height, the proposed increases in the maximum allowable HAAT and AGL for fixed TVBD antennas are paired with a proposal for larger protected contours for incumbent stations.
- The proposal to relax the transmit spectral mask for fixed TVBDs is needed to allow TVBDs to take advantage of existing high-volume wireless technology. Unless TVBDs can take advantage of the economies of scale of existing wireless technologies, fixed TVBDs would be unable to make efficient use of the TV White Spaces spectrum at a cost that would allow widespread use of TVBDs for wireless broadband services.
- The relaxation of the transmit spectral mask for fixed TVBDs is accompanied with a proposal to increase the separation distance from incumbent transmitters, which will maintain the same level of incumbent protection proposed in the 2nd MO&O.



The attached material, presented during the meeting, reviews the public interest benefits in adopting the proposals detailed in these Petitions for Reconsideration, and explains the reasons why these proposals should be adopted to make the use of fixed TVBDs for wireless broadband services cost-effective and commercially viable.

Respectfully Submitted,

/s/ Chuck Powers

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